

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION**

JOSHUA GOLDEN AND LISA GOLDEN,)
)
Plaintiffs,)
)
vs.)
)
UNITED VAN LINES, LLC, LEXICON)
RELOCATION, L.L.C., SUDDATH)
RELOCATION SYSTEMS OF CHARLOTTE,)
LLC a/k/a SUDDATH OF CHARLOTTE,)
SUDDATH VAN LINES, INC., PLANES)
MOVING & STORAGE, INC. AND JOHN)
DOES 1 THROUGH 10.)
)
)
Defendants.

Case No.: 9:24-cv-01506-DCN

**PLAINTIFF'S ANSWERS TO LOCAL
CIVIL RULE 26.01 INTERROGATORIES**

Plaintiffs Joshua Golden and Lisa Golden (“Plaintiffs”), by and through their undersigned counsel, respond to Local Civil Rule 26.01 Interrogatories as follows:

- A. State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

Response: Plaintiff is not aware of any such persons or entities.

- B. As to each claim, state whether it should be tried jury or non-jury and why.

Response: Plaintiffs demand a jury trial on all claims, and they have not waived their right to a jury trial.

- C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner or affiliate; (2) each publicly owned company which owns ten

percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding share.

Response: Plaintiffs are individuals.

- D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

Response: **Venue is proper in this division because Plaintiffs are residents of this division, the Home where the property was transported to and delivered in its damaged condition is in this division, and Plaintiffs are informed and believe that a portion of the damage and loss to their property took place within this division. Thus, this is the appropriate venue and division under 49 U.S.C. §14706(d).**

- E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.

Response: None.

- F. Parties or Intervenors in a Diversity Case. In an action in which jurisdiction is based on diversity under 28 U.S.C. §1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court's jurisdiction under §1332(a).

Response: Plaintiffs are citizens of South Carolina.

Respectfully submitted,

The Floyd Law Firm

/s/ James L. Floyd, III
James L. Floyd, III (“Lee”)
Fed Bar No.: 10076
3255 Maybank Highway
Johns Island, SC 29455
Phone: (843) 258-1200
Email: lfloyd@floydlawsc.com

March 27, 2024
Charleston, South Carolina